

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. No. 04-30241-MAP

MICHAEL F. ERALI,

Plaintiff

v.

TOWN OF ORANGE,

Defendant

JOINT SCHEDULING
STATEMENT PURSUANT
TO L.R. 16.1

The parties in the above-captioned matter hereby submit the following proposed Scheduling Statement pursuant to Local Rule 16.1(D):

I. DISCOVERY PLAN

The parties propose the following discovery plan:

- A. Automatic Document Disclosure to be completed on or about April 27, 2005;
- B. All discovery requests, including without limitation, written discovery, responses thereto, and depositions (excluding expert depositions), must be completed on or before November 30, 2005;
- C. Plaintiff's expert witnesses shall be designated by January 31, 2006 and defendants' expert witnesses shall be designated within thirty (30) days after plaintiff's disclosure;
- D. All expert depositions shall be completed within thirty (30) days of defendants' expert designation.

II. MOTION SCHEDULE

All dispositive motions are to be filed on or before May 31, 2006.

III. ADR SCHEDULE

If the parties agree, at any time, before or after completion of discovery, to submit this matter to alternative dispute resolution through the Court sponsored Mediation Program, they shall so advise the Court to do so.

IV. CERTIFICATIONS

The defendant filed its L.R. 16.1 certification of conferral on March 18, 2005, and the plaintiff will file the same on or before the date of the Scheduling Conference.

V. CONSENT TO TRIAL BY MAGISTRATE

The parties do not consent to trial of this matter before a magistrate judge.

PLAINTIFF,
MICHAEL F. ERALE

By his attorney,

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DEFENDANT,
TOWN OF ORANGE,

By its attorneys,

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